

1 Q. Does someone have documented the number of
2 problems that remain outstanding and the severity
3 of those problems for every single system?

4 A. I would believe that that's out there, yes.

5 Q. And did you review that information prior to
6 drawing your conclusions?

7 A. No, I did not.

8 Q. Were you assured by the individuals that you spoke
9 to that they had reviewed that information?

10 A. Yes.

11 Q. And so you are relying on their expertise that
12 they have resolved essentially all of the problems
13 that had been identified to that date?

14 A. That is correct.

15 Q. And so to the extent that you are unable to
16 respond to specific questions that were raised by
17 Ms. Marsh, is that because you personally did not
18 have knowledge and that would have been an
19 individual that works for you? Or is that because
20 the individual was not aware of that specific
21 problem until it was identified by AT&T?

22 A. I believe it's the first. Most of the
23 responsibility for these were people that either
24 reported directly to me or report to me indirectly
25 through other organizations. The magnitude of

1 reports such as this on all the different
2 interfaces would just overwhelm me. So the only
3 time I get involved with the day-to-day thing is
4 on escalation. If there is some problem that
5 can't get resolved or some issue between the
6 groups that can't be resolved, I usually get
7 involved.

8 Q. Okay. With regard to the MORTEL, there was a
9 discussion about bugs in the MORTEL system. And I
10 think you said that there were -- you were aware
11 that there were a handful remaining. I presume
12 that means five or less?

13 A. Yeah. The only one that I was -- excuse me, I can
14 tell you this, two that I can definitively
15 identify, one is the 865 that we discussed
16 earlier, and the other one is an 860 problem that
17 we're having with the next release of the
18 software.

19 Q. And what is an 860?

20 A. 860 is a change notice. So an order has been sent
21 and then a change -- they would like to add call
22 waiting to the order and it's already been, you
23 know, submitted for processing, they would like to
24 change the order, they submit an 860. For the new
25 release I'm aware that there is an issue with

1 that.

2 Q. Okay. So when you say there is two or less than a
3 handful, they're categories of problems, they're
4 not necessarily numbers of orders?

5 A. Yes.

6 Q. Okay. Exhibit 6, page 83, I think you were
7 directed to No. 77986. And the question that was
8 asked of you was would this indicate a problem
9 with AT&T's system. The question that I have for
10 you, would this indicate necessarily that there is
11 a problem with Ameritech's system, or is this
12 something that would be fairly normal?

13 A. Is this the one on the top of page 83, 779 --

14 Q. 77986.

15 A. No. This is not a problem with either system.
16 What this is saying that the electronic -- the
17 order was received electronically. And then when
18 the system -- they said well, I need to create an
19 order, put it in the Ameritech systems for that.
20 Looked at the order, came in, and said okay, I
21 need to get the information that currently exists
22 on that line. And it goes out there and says
23 wait, there is more lines on here than in this
24 order. So we have to figure out what to do with
25 it. And we haven't systematically figured out how

1 to process that. So we drop it out for manual
2 intervention.

3 Q. Okay. And same exhibit, page 80, item 77923, I
4 believe the error was that it could not insert the
5 information into the database. Would this cause a
6 problem for billing?

7 A. No, it would not.

8 Q. Okay.

9 A. But this one, the result -- this is -- what
10 happens in a case like this is the order is
11 dropped out for manual intervention. And what the
12 service rep, the Ameritech service rep can do is
13 to try to reflow that order again, try to do it
14 one more time, see if it will work. If it doesn't
15 work, then the order gets processed manually.
16 They put the order in the back-end system.

17 Q. Okay. On page 10 of your direct testimony you say
18 that the ASR has been processing live transactions
19 since April of 1995?

20 A. That is --

21 Q. Could you give me a sense of who has been using
22 the system since that point in time and the volume
23 over time?

24 A. I don't remember who was the first one using it.
25 It started before I came on. But Brooks and CCI

1 are the two that are using it right now, somewhere
2 between 300 a week orders coming in between the
3 two of them. The volume really picked up the
4 first part of '96 sometime in the I believe April
5 or May, I'm not sure when it was. From there it
6 just kind of stayed consistent of 150, 200 a day
7 for each one.

8 Q. So it was fairly slow in 1995?

9 A. Most definitely.

10 Q. Picked up in '96?

11 A. Most definitely.

12 Q. And it's been fairly flat since 1996?

13 A. Yes, that's correct.

14 Q. Okay. Could you tell me, there were several
15 questions about whether a order would be processed
16 by EDI or ASR. And I'm trying to understand why
17 is that important. Is it important because you
18 have to use two separate systems which makes it
19 more difficult, or is there something better or
20 worse with EDI or ASR?

21 A. The reason that most of the interfaces are still
22 using -- the ASR is there because that's
23 predominantly what was in the industry before this
24 act came into play. When it came to ordering,
25 IXCs had predominantly most of their ordering with

1 the RBOCs, regional Bell companies, using the ASR
2 process. They build their networks and put trunks
3 between their switches and our switches. They
4 sent to ASRs.

5 So when we first went into this, we went
6 in and said let's use the same process. And
7 that's why the loop ended up on the same process
8 because they started back in '95. And then as
9 time goes on, it's that interface to reach a
10 wall. You couldn't expand it to be able to
11 provide the richness of the products and services
12 that it needed. So for the line side stuff which
13 is where all that is, we -- we went with the EDI
14 interface.

15 Q. Do you see eventually a transition to EDI?

16 A. For some of the products, I believe that some of
17 them, like the loops I think would eventually go
18 to EDI. The trunk side of it, the building of the
19 network and putting the circuits onto that, I
20 think we would probably get a revolt if we said
21 you're going to send us an access feature group D
22 trunk using an ASR, but you're going to send us an
23 unbundled tandem trunk using EDI. By the way,
24 they're the exact same thing except we're going to
25 bill you differently for them.

1 Q. Can you tell me, I'm getting even more basic,
2 what's an EDI versus an ASR? What do I care as an
3 end customer or as a CLEC?

4 A. Well, the EDI interface is more robust because
5 it's more conversational. And EDI interface part
6 of the exhibits that were offered were orders that
7 we reject because they had invalid data on the
8 order. The ASR process is not that robust. It's
9 whatever we give you, you figure out how to
10 process it.

11 The ASR and the EDI are both based on
12 the premise of a paper form, both the ASR is a
13 fixed formatted record that you send with data in
14 it using a paper document which has the same name
15 and access service request. And the EDI uses an
16 electronic purchase order which is the same type
17 of thing that K-Mart would use to order toys from
18 Mattel. But both of them are based on the premise
19 of a paper flow.

20 Q. Again, this gets at your statements several times
21 that all tests were successful or that it is
22 operational. Can you define for me your
23 definition of success? From previous statements I
24 presume it's not 100 percent error free. What is
25 successful?

1 A. If it failed, it was fixed and then retested.

2 Q. What do you expect to be a reasonable error rate
3 in an ongoing system?

4 A. I don't know if I could quantify that.

5 Q. Do you have a sense of the error information, and
6 again, this is a general question on all of the --
7 all of the components of the OSS, how often you're
8 seeing significant repeating errors that would
9 cause you to believe that there is a flaw, a
10 material flaw in the system?

11 A. No. I don't believe we have any errors that lead
12 us to believe there is a material flaw. What we
13 have done recently we even have taken a step that
14 usually takes place, you know, after it's in
15 production is looking now to add additional
16 capacity and to fine tune this system to decide
17 what it will take to add that additional
18 capacity.

19 So we're looking at even working at
20 efficiencies in the system to make it run faster
21 and more efficient so we kind of focus -- focus is
22 no longer on trying to resolve the daily bugs.
23 It's at a manageable level. Now we figure out
24 what we can do to improve it and make it run even
25 better.

1 Q. One of the issues that we're going to need to be
2 able to resolve is the issue of parity.
3 Ameritech's ability to process orders compared to
4 a competitor's ability to process orders in the
5 same timeline. And as I understand it at least
6 from the staff testimony is we have information
7 about the OSS and how it functions and how quickly
8 it can process an order either electronically or
9 manually, but there isn't comparable data for
10 Ameritech processing of its own orders.

11 How would you suggest that the
12 commission -- what information would you suggest
13 that we look at to be able to make the call or do
14 the analysis whether you're providing comparable
15 service?

16 A. I believe the measurements you are alluding to are
17 in Mr. Mickens' testimony where they will for the
18 resale component provide the comparison of how
19 CLECs are doing in their order, meeting the due
20 dates based on themselves, what their measurement
21 is, what they are against other CLECs and what
22 they are against the retail. But Mr. Mickens has
23 the authority on that.

24 EXAMINER JAMES: I think we need to
25 understand that Mr. Mickens has been called for

1 the 3rd of April and can't come sooner and that I
2 had a discussion with Mr. Paulson as to what he
3 intended to do, and he said Mr. Mickens had no
4 information that he needed to put into this phase
5 of the hearing.

6 MR. BERMAN: May we go off the record?

7 EXAMINER JAMES: Sure.

8 (Discussion off the record.)

9 EXAMINER JAMES: Back on the record.

10 BY CHAIRMAN PARRINO:

11 Q. Let me try the first basic question, what we're
12 trying to get at is a sense of what information
13 Ameritech has and what information you can provide
14 us with today that the operational system and the
15 processing, the preordering, the ordering,
16 maintenance and repair, all of the particular
17 elements in the systems capability will process
18 all of those items in a comparable or in the same
19 time frame or in the same manner that Ameritech
20 customer service reps would use and process the
21 information.

22 A. Okay. Once the interfaces that we have developed,
23 the sole function is to get the order in the same
24 pool as retail. We have not separated the orders
25 out in any way. So it's not like the CLEC order

1 takes path A and the Ameritech retail takes path
2 B. They both take the same path once they're into
3 the system. We just have identified the orders
4 and identified the trouble in a way that when the
5 person who is working with the end customer can
6 deal with it.

7 An example on the ordering interface,
8 the only difference as the order is processed is
9 that we've added an identifier in the line to say
10 this line can't be viewed by retail. Besides
11 that, it's completely put into the system and put
12 in the same queue as the rest of the orders.

13 Once the orders are in there, then we
14 have used that same identity to do reports. So
15 when the orders get processed, we can take the
16 orders out and say that the due dates were made or
17 by what percentage of retail, what percentage of
18 CLEC, what percentage of by this individual CLEC.

19 Q. Let me try at something a little bit more
20 specific, a question a little bit more specific.
21 If I am a CLEC and I am processing an order and
22 giving you preorder information and it kicks out
23 of the electronic system into a manual system,
24 what you're telling me is that doesn't really
25 matter. The thing that's important is did your

1 people meet the due date?

2 A. That's correct.

3 Q. And were the percentage of the CLEC's orders
4 processed -- did they meet due dates, did the
5 missed due dates for CLECs compare to the missed
6 due dates for orders processed by Ameritech?

7 A. That is correct. Because the preordering
8 interface provides the due date and a telephone
9 number before the order is submitted. So the CLEC
10 knows what commitment due date we have given
11 before we get the order, before we've made the
12 determination of whether or not it requires manual
13 intervention. So we've committed to complete that
14 order on this date before they even submit it. So
15 the manual intervention doesn't play in that
16 circumstance.

17 Q. How often does Ameritech miss due dates for CLECs
18 and how often does Ameritech miss due dates for
19 its own customers?

20 A. That I can't definitively answer that. I have not
21 seen the actual reports.

22 Q. But what you're telling me is the important issue
23 is whether or not a due date has been met?

24 A. Yes. I don't know those numbers, but I do know
25 that those numbers are beginning to be shared with

1 CLECs on a monthly basis or quarterly basis.

2 Q. Is there someone at your company who would know
3 that information if you're telling me what -- how
4 I ought to judge Ameritech and its OSS system is
5 how it does on making due dates, it seems like
6 that's a critical piece of information?

7 A. I believe that -- I know that those reports exist
8 because I've seen them. But I can't recall -- I
9 mean I can go get copies of them.

10 Q. I would appreciate that information being
11 supplied.

12 EXAMINER JAMES: Mr. Dawson, are you
13 clear on that?

14 MR. DAWSON: Yes, I am. Thank you.

15 EXAMINER JAMES: Shall we give you an
16 exhibit?

17 MR. DAWSON: 9.

18 THE WITNESS: It will have to be -- I'm
19 assuming it will have to be a confidential exhibit
20 because it will have CLEC, individual CLEC
21 performance on it.

22 MR. DAWSON: If I can suggest, Your
23 Honor, a number, and we will use letter
24 designations to make any sub-exhibits of the
25 larger one if it's multi-paged.

1 EXAMINER JAMES: All right. We will
2 give you Delayed Exhibit 9. How would you
3 describe that exactly?

4 MR. DAWSON: I would ask Mr. Rogers to
5 describe it.

6 EXAMINER JAMES: All right.

7 THE WITNESS: Most recent reports.

8 EXAMINER JAMES: And due dates met.

9 THE WITNESS: And due dates met.

10 EXAMINER JAMES: We're clear that's for
11 all the CLECs and you?

12 THE WITNESS: Yes, that's one of the
13 columns on the report.

14 MR. DAWSON: Joe, you're talking about
15 comparing orders placed by CLECs versus orders
16 placed through Ameritech service reps?

17 THE WITNESS: It is CLECs, it is CLEC X
18 against all the CLECs and then CLEC X against
19 Ameritech retail, those services.

20 (Exhibit 9 designated for delayed
21 receipt.)

22 EXAMINER JAMES: Does that satisfy
23 everybody?

24 MR. KELLEY: Will staff and others who
25 wish be able to see the information underlying any

1 summary format that Delayed Exhibit 9 comes in,
2 masked however necessary?

3 EXAMINER JAMES: I assume. We can go
4 off the record.

5 (Discussion off the record.)

6 BY CHAIRMAN PARRINO:

7 Q. On page 22 of your direct testimony before the
8 first question on that page you comment of 90
9 orders that could not be completed, of 90 orders
10 that could not be completed, 79 could not be
11 completed because of AT&T errors. Do I assume
12 then that the other 11 are a result of Ameritech
13 errors?

14 A. Yes, that is correct.

15 Q. Okay.

16 CHAIRMAN PARRINO: That's all the
17 questions I have.

18 EXAMINER JAMES: All right. Let's go
19 off the record for a second.

20 (Discussion off the record.)

21 (Recess taken.)

22 EXAMINER JAMES: On the record. Mr.
23 Dawson, redirect?

24 Redirect Examination

25 By Mr. Dawson:

1 Q. Mr. Rogers, I want to pick it up right where we
2 left off. Is there anything that you are aware of
3 in the design, testing or utilization to date in
4 fact of the interfaces which allow CLECs to
5 connect to Ameritech's OSS functions which suggest
6 to you that there should be or is in fact any
7 difference between the level of service offered a
8 CLEC ordering service and the level of service
9 available to an Ameritech service rep now?

10 MR. BERMAN: I'll object to the
11 question. I don't understand it. It was awful
12 long. Are you asking him if he has knowledge,
13 personal knowledge of the negative here?

14 MR. DAWSON: I'm very happy with my
15 question.

16 EXAMINER JAMES: Read it back, please.
17 Is that an objection?

18 MR. BERMAN: Yes, objection to the form
19 of the question.

20 EXAMINER JAMES: Read it back.

21 (Record read.)

22 EXAMINER PASKE: I guess I have a
23 problem with the form of the question in that
24 you've asked an alternative question in one,
25 question and one of them is that there should be

1 and the other one is that there is in fact. And
2 I'm not sure how he's going to answer that if you
3 don't take it apart. If you would rephrase it,
4 please.

5 BY MR. DAWSON:

6 Q. Is there anything in the systems that you are
7 aware of which should create any difference in the
8 level of service as I just defined it for you?

9 A. No, there is not.

10 Q. As you sit here today, are you aware of there
11 being any difference in the level of service
12 available to CLECs or through Ameritech service
13 reps?

14 A. No, I do not.

15 Q. Early today you said returning back to ground
16 zero, Mr. Rogers, that in discussing preordering
17 functions with Ms. Marsh that USN was using itself
18 only the CSR functionality; is that correct?

19 A. That is correct.

20 Q. Has Ameritech performed internal testing of the
21 other two functions, access to a due date and to
22 telephone numbers?

23 A. Yes, and we also have done implementation testing
24 with USN.

25 Q. With USN?

- 1 A. Yes.
- 2 Q. Those tests were satisfactory?
- 3 A. Yes.
- 4 Q. Any problems that are not solved?
- 5 A. No.
- 6 Q. By the way, would you expect ever under any
- 7 circumstances to introduce systems like these
- 8 without there being errors and problems?
- 9 A. No, I would not.
- 10 Q. Isn't that in fact why people like you have their
- 11 jobs?
- 12 A. Yes, it is.
- 13 Q. You still have in front of you the two exhibits
- 14 which Ms. Marsh showed you identified as service
- 15 readiness testing, one for Illinois and one for
- 16 Michigan I believe. They are identified as TMC-5
- 17 and TMC-9.
- 18 A. Yes, I do.
- 19 Q. And she read into the record the fact that a
- 20 certain percentage of those tests showed that the
- 21 process had to involve some manual intervention
- 22 and some were rejected?
- 23 A. That is correct.
- 24 Q. Do you know how many were rejected because of
- 25 problems associated with Ameritech systems as

1 opposed to some problem with Ameritech's -- with
2 AT&T's input?

3 A. The same 11 that I had in my testimony are in
4 these numbers here.

5 Q. And all others are attributable to AT&T's input?

6 A. Yes.

7 Q. Did any of the errors identified lead to the -- a
8 change in any of the Ameritech's systems?

9 A. The 11 did, yes.

10 Q. And they were implemented?

11 A. Yes.

12 Q. Those tests are through the middle of February --
13 excuse me, those tests show data through the mid
14 of February, am I right?

15 A. For the week ending 2/14, yes.

16 Q. Were any orders rejected that should not have been
17 rejected?

18 A. Those same 11 that were alluded to in my
19 testimony.

20 Q. By the way, there has been some testimony today
21 about the fact that Ameritech and AT&T are now
22 doing business together, aren't you?

23 A. That's correct.

24 Q. AT&T is in fact reordering service for resale?

25 A. That is correct.

1 Q. And do you know through last week, for example,
2 what percentage of its orders were rejected?

3 A. 5 percent.

4 Q. Have you heard counsel say 40 percent, is that a
5 correct number?

6 A. As of last week that is wrong.

7 Q. Last week the number was how much again, please?

8 A. 5 percent.

9 Q. And in doing business with AT&T in fact since
10 March 10 of this year how many orders received
11 from AT&T have been able to be processed wholly
12 electronically and how many -- percentage wise,
13 involve some manual intervention?

14 A. It was 76 percent of them. That was as of the
15 week before last. I did not include last week's.
16 I didn't have last week's numbers.

17 Q. 76 percent were handled electronically?

18 A. Yes.

19 Q. And 24 involved some manual intervention?

20 A. That's correct.

21 Q. And I think in rebuttal testimony you point out
22 that the highest level reached, spiked at 85
23 percent electronic?

24 A. That's correct.

25 Q. And 15 percent manual?

- 1 A. That's correct.
- 2 Q. When an order involves some level of manual
3 intervention, there has been words used like
4 manual fall-out or falling out or dropping off,
5 does that mean that the order is going to be
6 mishandled?
- 7 A. No, it does not.
- 8 Q. Does it mean the customer is going to receive the
9 service requested any later on in any other form
10 than requested?
- 11 A. I do not believe so, no.
- 12 Q. Do you ever expect there will be, Mr. Rogers, a
13 system or a series of systems in which there will
14 be zero orders requiring manual intervention?
- 15 A. No, I do not. I mean that's a broad statement.
16 But I do not believe that these systems will ever
17 experience 100 percent.
- 18 Q. In your business judgment should such systems be
19 designed so that there will never be a necessity
20 of a human person involved?
- 21 A. I don't believe it's fiscally a good thing to do.
- 22 Q. By the way, if you were to attempt to design and
23 create such a system that became literally free of
24 human intervention, who would pay for it?
- 25 A. I'm not sure. I know it would come out of my

1 budget. I'm not sure whether or not it would be
2 -- what type of pricing mechanisms we have. I'm
3 not -- where the money comes from is not my area
4 of responsibility. I'm just there to spend it.

5 Q. Ultimately it would be your customers I assume who
6 would pay for it?

7 A. Yes.

8 Q. In response to questions put to you earlier, you
9 mentioned that at the present time all orders for
10 unbundled loops are handled manually, and I
11 believe I heard you testify that's because you
12 were waiting for the provision of or designation
13 of long-term number portability; is that correct?

14 A. That's correct.

15 Q. Can you explain how those two connect?

16 A. Well, until there is long-term number portability,
17 it requires a lot of manual coordination between
18 all the orders because besides the physical move
19 of the line from the Ameritech network to the CLEC
20 network, it also requires a few orders to put in
21 the Ameritech systems to take the line out of
22 service and to port that number to a CLEC. And
23 all those have got to be done at the exact same
24 time. And they're done through different
25 systems.

1 So all those orders need to be
2 coordinated. And once long-term number
3 portability comes, the CLEC will go to the
4 third-party provider and do the number portability
5 so we won't have that coordination of those type
6 of orders anymore. We won't have to take a line
7 out of service first or to port the number before
8 we actually physically move it. And at that time
9 it's a more feasible time to the mechanization.

10 Q. So the current process is a result of a business
11 timing issue, not the result of some failure of
12 system?

13 A. That is correct.

14 Q. When did you first learn, yourself personally, Mr.
15 Rogers, of this problem reported to you by AT&T
16 concerning the 865 confirmation process?

17 A. When I met with AT&T last Tuesday.

18 Q. And when did you learn that your staff had given
19 that a priority 3?

20 A. At the same time.

21 Q. Was that handled properly in your view?

22 A. Well, I mean first glance it was because as
23 Ameritech, we never -- I'm embarrassed to say.
24 When we complete service orders, they flow through
25 the systems, and we never check to make sure that

1 they actually are completed. So my staff, whoever
2 it was who was responsible for this, looked at
3 that and said that, you know, that status
4 information, whenever it gets there, is
5 efficient.

6 But I do believe after speaking to AT&T
7 and determining how important it was to them that
8 it should be an issue 1 and not an issue 3 like it
9 was reported.

10 Q. Is that being addressed now?

11 A. Yes, it is.

12 Q. That's one of -- Strike that. You did mention, I
13 think this may have been covered by the
14 commission, but I want to make sure it was. You
15 mentioned that you thought there was no more than
16 a handful of bugs in the MORTEL system, at least
17 those that had been brought to your attention with
18 a high priority, priority 1 or 2, is that your
19 testimony?

20 A. Yes, it is.

21 Q. Do you know how many in fact you are aware of now
22 such bugs as you called them, priority 1 or 2?

23 A. The two that I mentioned, the 860 and the 855.

24 Q. 865?

25 A. That is correct.

1 Q. And the 860 is an issue with respect to a revised
2 version of the existing specifications?

3 A. Yes, with respect to the 860s is a bug in the
4 software yet to be released.

5 Q. You testified earlier that --

6 A. Counsel, I may have to correct that. I think that
7 release may have been escalated and released
8 today.

9 Q. Today?

10 A. Today.

11 Q. Okay.

12 A. Not supposed to be released until a week from
13 today.

14 Q. Are those two bugs -- is bug the right word?
15 Lawyers use that word. Is that the word you use?

16 A. That's a good characterization.

17 Q. Okay. Are those two bugs the two issues which
18 cause you to say that the system is not now fully
19 operational?

20 A. Yes.

21 Q. Are there any others that you're aware of?

22 A. Not that I know of.

23 Q. Do you think in fact as you sit here that there
24 are any others?

25 A. It is my belief that there is no others.